

## Rollins, Christopher

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**From:** Olin, Joyce  
**Sent:** Tuesday, October 29, 2013 11:36 AM  
**To:** Rollins, Christopher  
**Subject:** RE: PCBs/Ships -- Potential Illegal Export of a US ship --

Thanks much.

Joyce Olin  
Federal Facilities Enforcement Office (2261A)  
U.S. Environmental Protection Agency  
1200 Pennsylvania Avenue, NW  
Washington, D.C. 20460  
Phone (202) 564-2772

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**From:** Rollins, Christopher  
**Sent:** Tuesday, October 29, 2013 2:31 PM  
**To:** Olin, Joyce  
**Cc:** Muller, Marie  
**Subject:** RE: PCBs/Ships -- Potential Illegal Export of a US ship --

Joyce,

I've spoken with both the GSA and the Coast Guard last week about this matter. Apparently in 2000, PCB sampling was conducted by the Coast Guard on the Storis. At that time, the vessel was owned by the Coast Guard and they wanted to transfer their vessel. PCBs  $\geq 50$  ppm were detected and sometime between 2000 and 2007 the Coast Guard representative Jeff Beach states that he petition for the Coast Guard to remediate the PCBs from the vessel. Based on Jeff Beach, that was done. However, he didn't obtain that second round of analytical data for his own records. Only then 2007 memo stating that now the vessel was PCB Free was the only document that they had in their possession.

The Coast Guard then contacted GSA. GSA treats the vessel as Excess Federal Property, so there are no current procedures in place for addressing these smaller vessels that are owned and managed by other Federal Agencies (Navy and Coast Guard). Based on previous dealings with the GSA and auctioning of vessels that may contain PCBs, I recommended that GSA obtain some type of certification or data showing that these vessels are no longer TSCA regulated before they approve the sale.

The Coast Guard provided the letter to GSA but not any analytical data. Since GSA didn't want to second guess the validity of the PCB remediation project they accepted the letter and approved the sale.

c

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**From:** Olin, Joyce  
**Sent:** Tuesday, October 29, 2013 5:43 AM  
**To:** Rollins, Christopher  
**Cc:** Muller, Marie  
**Subject:** FW: PCBs/Ships -- Potential Illegal Export of a US ship --

Christopher—

This should have gone to you as well. Any word on what is happening?

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**From:** Devlin, Betsy  
**Sent:** Tuesday, October 29, 2013 8:04 AM  
**To:** ORCR IO; Straus, Matt; Kelley, Rosemarie; Schefski, Kenneth; Olin, Joyce; Kling, David; Grant, Brian  
**Cc:** Elliott, Ross; Noggle, William; Picardi, Rick; Coughlan, Laura  
**Subject:** PCBs/Ships -- Potential Illegal Export of a US ship --

Dear everyone –

This is a heads up on a potential issue which is developing rather quickly. The short summary is that we may (and I stress may) have a situation of an illegal export of a ship containing regulated levels of PCBs. The ship is apparently headed to Mexico for scrapping. If the ship does have PCBs greater than 50 ppm then we may have a violation of TSCA. We are still attempting to piece together the facts of the situation, working with Region 9. We are likely to have press inquiries and a press release from BAN.

Joyce and Dave – have sent this to you because this may be a situation where GSA or the Coast Guard may bear some responsibility.

What we know is as follows:

In June 2013, GSA auctioned the Storis (Retired 1942 US Coast Guard ship). As of today the ship is apparently headed to Mexico for scrapping. A US Coast Guard hazmat report from November 2000 shows PCBs greater than 50ppm (which is illegal to export for disposal) in two samples of pipe insulation. It's unclear whether the PCB samples were remediated or if further sampling was conducted.

The losing bidder in the GSA auction was Jon Ottman, who was attempting to purchase the Storis and convert it into a museum ship. Mr. Ottman has also reached out to Senator Mark Begich (Alaska) for help. According to this article <http://www.alaskapublic.org/2013/10/28/storis-supporters-see-ray-of-hope-in-saving-cutter/> Senator Begich is trying to contact us (EPA) to find out what went wrong. Also BAN is planning on issuing a press release on this issue.

We are still piecing together the full story with Region 9, who was made aware of the situation early last week. The communication staff from Region 9 has already received press inquiries and we have asked them to coordinate with us and the ORCR press office before responding. We are also reaching out to USCG to find out what they meant by the following comments in their November 2000 hazmat report: "Please be advised that the

CGC Storis is free of PCBs. All material that is above 50ppm and not defined as totally enclosed are considered PCB containing for regulatory purposes.” Encapsulated PCBs are still illegal to export for disposal above 50 ppm. We also need USCG to tell us if any further sampling and remediating was done.

Finally, we are reaching out to MARAD to determine why this vessel did not go through the reflagging process.

So, we will keep everyone informed as things progress.

Please feel free to contact me or Bill Noggle in MRWMD if you have any questions.

Betsy Devlin, Director  
Materials Recovery and Waste Management Division  
(703) 308-7906